

EXHIBIT 7

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

MATTHEW PETERSON, SADIE FLODING,
COLIN STRUB, CARSON BRENDA, JODY
BARRY, TEISCHA BENSON, LYNNETTA
KLAM, and LORI DAVIES,

**CERTIFIED
TRANSCRIPT**

Plaintiffs,

vs.

Case No:
1:22-cv-00701 JLT-CDB

THOMSON INTERNATIONAL,
INCORPORATED, a California
corporation; DOES 1-10, INCLUSIVE;
and ROE ENTITIES 1-10, INCLUSIVE,

Defendants.

_____ /

VIDEOCONFERENCE DEPOSITION OF MATTHEW PETERSON

Taken remotely before LORI A. YOCK, CSR, RPR

Certified Shorthand Reporter No. 5801

State of California

Tuesday, January 23, 2024

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EXAMINATION BY MS. CHEN

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EXAMINATION BY MS. LIEN

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FURTHER EXAMINATION BY MS. CHEN

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E X H I B I T S

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EXHIBITS:

PAGE

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Exhibit 1 Documents produced by
Plaintiff, Bates PETERSON0001
to PETERSON0173

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VIDEOCONFERENCE DEPOSITION OF MATTHEW PETERSON

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BE IT REMEMBERED that pursuant to Notice of

16

Taking Deposition, and on Tuesday, January 23, 2024,

17

commencing at the hour of 10:15 a.m. PST, taken via Zoom

18

videoconference, before me, LORI A. YOCK, CSR No. 5801,

19

a Certified Shorthand Reporter in and for the State of

20

California, remotely appeared from Portland, Oregon,

21

MATTHEW PETERSON,

22

produced as a witness in the above-entitled

23

action, who being by me first duly sworn, was thereupon

24

examined as a witness in said action.

25

1 Q. Was Lindsay the first law firm -- was Lindsay's
2 law firm the first law firm you retained?

3 A. Yes.

4 Q. Did you file the lawsuit against Thomson only
5 through Lindsay?

6 A. Yes.

7 Q. What are you suing Thomson for?

8 A. Can you repeat that, please?

9 Q. What are you suing Thomson for?

10 A. Salmonella poisoning.

11 Q. You listed Celina Fugate as a witness.

12 A. Yep.

13 Q. What is she going to testify at trial on
14 December 3rd, 2024?

15 A. What happened, I guess.

16 Q. Tell me what happened.

17 A. I started having stomach pains, and then they
18 progressively got worse until it was too much pain for
19 me to deal with, and so I went to the hospital.

20 Q. Was Ms. Fugate with you when you had stomach
21 pains initially?

22 A. Yes.

23 Q. Was she living with you at the time?

24 A. Off and on, yes.

25 Q. Is Ms. Fugate's address 4717 Southeast Jennings

1 Q. Do you know his highest degree of education?

2 A. I don't.

3 Q. What did you tell Mr. Purcell?

4 A. How I was feeling, tell him how much pain I was
5 in.

6 Q. How were you feeling? Could you testify?

7 A. Could I? Yes.

8 Q. Please testify.

9 A. Okay. I was having incredibly strong pains in
10 my lower abdomen that were steady, pretty intense pain,
11 with waves of cramping that was some of the most extreme
12 pain I've ever felt in my life.

13 Q. When did that happen?

14 A. I don't remember the dates exactly, but it
15 started four days before I went to the hospital.

16 Q. When you had the pain, did that happen in June or
17 July of 2020?

18 A. I don't remember.

19 Q. Did you do anything before you went to the
20 hospital?

21 A. I did -- yeah.

22 Q. Tell me what you did.

23 A. I walked around my house. I sat on my couch.
24 I was in an incredible amount of pain. So I was curled
25 up in a ball on the floor. And that was about all that

1 have after you leave the hospital?

2 A. My stomach still hurt, but it wasn't nearly as
3 bad after they gave me painkillers. And then as long as
4 I stayed on the painkillers, it was -- it still hurt,
5 but it was manageable.

6 Q. Do you know the diagnosis your doctor gave you at
7 Kaiser?

8 A. They told me I had ulcerative colitis.

9 Q. Did they prescribe any medications for your
10 colitis?

11 A. I don't remember exactly what they prescribed
12 me that day.

13 Q. Did you have any other symptoms other than
14 stomach pain?

15 A. Not when I went to the hospital. After that, I
16 started to have diarrhea.

17 Q. Would you describe the diarrhea symptoms?

18 A. Yeah. It was -- my movements were all liquid,
19 and they were happening very often. I would say between
20 five and seven times a day.

21 Q. How long did you have diarrhea?

22 A. For about four to six months.

23 Q. Did doctor prescribe any medications for you for
24 diarrhea?

25 A. Not that I remember.

1 Q. Did you seek any medical treatment for your
2 diarrhea?

3 A. No.

4 Q. Did you take any medication for diarrhea?

5 A. No.

6 Q. At any time in the four to six months, did your
7 diarrhea symptoms ever get better?

8 A. Eventually they did get better.

9 Q. Let me ask you this question. After your first
10 week of diarrhea, how often did you have diarrhea in the
11 second week?

12 A. It was frequent. Like I said, four to seven
13 times a day would be my guess.

14 Q. After one month, how frequent was the diarrhea?

15 A. The same, four to seven times a day.

16 Q. What about the third month?

17 A. Yeah, same thing.

18 Q. How about the fourth month?

19 A. It -- I don't remember exactly how long it went
20 on for, but it was the same all the way through.

21 Q. Did your diarrhea stop after four to six months?

22 A. Yes, somewhere in there it stopped.

23 Q. After your visit to Kaiser emergency room, did
24 you seek any other medical treatment for salmonella?

25 A. No.

1 A. No.

2 MS. LIEN: Objection; foundation.

3 BY MS. CHEN:

4 Q. I cannot hear your answer.

5 A. No.

6 Q. Are you aware of any facts linking your
7 salmonella illness to Thomson?

8 MS. LIEN: Objection; foundation. Go ahead,
9 Matt.

10 THE WITNESS: I don't know.

11 BY MS. CHEN:

12 Q. Are you seeking psychological care damages in
13 this lawsuit?

14 A. No.

15 Q. Are you seeking emotional distress damages in
16 this lawsuit?

17 A. Yes, I think so.

18 Q. Could you describe your emotional distress
19 symptoms?

20 A. Incredibly painful, and I thought I was going
21 to probably die.

22 Q. Anything else?

23 A. (Inaudible.)

24 (Reporter clarification.)

25 THE WITNESS: I don't know.